



Federal Court of Australia

District Registry: Western Australia Registry

Division: Fair Work

No: WAD229/2022

**PITA AWATERE TE TAU O TE RANGI**

Applicant

**WILSON SECURITY PTY LTD ABN 90 127 406 295**

Respondent

### **CONSENT ORDER**

**JUDGE:** Justice Colvin

**DATE OF ORDER:** 27 October 2025

**WHERE MADE:** Perth

#### **THE COURT NOTES THAT:**

- A. Subject to approval of the Court, and without any admission of liability on the part of the Respondent (which denies liability), the Applicant and Respondent have agreed that the proceedings will be settled for **\$3,050,000** on the terms set out in a confidential '**Deed of Settlement**' (**Proposed Settlement**), and in the event the Proposed Settlement is approved by the Court, the proceedings will be dismissed following administration of the Proposed Settlement.
- B. The Applicant will file an application for approval of the Proposed Settlement of the proceedings pursuant to s 33V of the *Federal Court of Australia Act 1976* (Cth) (**Act**) (**Approval Application**), supported by a confidential affidavit annexing the Deed of Settlement and proposed Settlement Distribution Scheme.
- C. The Respondent consents to the release of the records produced pursuant to order 18 of the orders made on 4 December 2023 (**first tranche**) and order 1 of the orders made on 26 March 2025 (**second tranche**) to Adero Law for the limited purpose of preparing settlement approval application material.



**BY CONSENT THE COURT ORDERS THAT:**

**Notice to Group Members and Distribution of Notice**

1. Pursuant to s 33ZF and/or s 33V of the Act, any person who is a Group Member as described in the second further originating application dated 13 September 2023 (**Group Members**) will be a Group Member for all purposes of the Proceeding, unless the person validly opted out of the Proceeding by 11.59 pm AWST on 29 January 2024 pursuant to s 33J of the Act or who may later be permitted to opt out of the Proceeding by the Court.
2. Pursuant to ss 33X and 33Y(2) of the Act, the form and content of:
  - (a) the notice at **Annexure A** to these orders (**Notice of Settlement**);
  - (b) the notice of objection to settlement form (**Notice of Objection to Settlement Form**) (**Schedule 1 to Annexure A**) and the request for inspection form (**Request for Inspection Form**) (**Schedule 2 to Annexure A**); and
  - (c) the cover letter at **Annexure B** to these orders (**Group Member Cover Letter**),is approved as the notice that must be given to Group Members under s 33X of the Act in respect of the application by the Applicant under s 33V of the Act for the approval of the proposed settlement of the Proceeding.
3. The Notice of Settlement may be amended by the parties before the Notice of Settlement is posted, emailed or published in order to correct any postal, website, email address or telephone number or any typesetting, typographical or other non-substantive errors.
4. Pursuant to s 33Y(3) of the Act, the Notice of Settlement is to be given to Group Members according to the procedure set out in orders 5 to 7 below.

*Online publication*

5. On or before 29 October 2025 and continuing until up to and including the final determination of the Approval Application the Applicant is, by his solicitors Adero Law, to publish the Notice of Settlement on, only, their website at the address <https://www.aderolaw.com.au/class-action/wilson-security/>.



6. Adero Law shall cause a copy of:
- (a) the second further amended statement of claim dated 13 September 2023;
  - (b) the proposed third further amended statement of claim dated 24 January 2025;
  - (c) the defence to the second further amended statement of claim dated 10 November 2023;
  - (d) the reply to the defence dated 1 December 2023;
  - (e) the Notice of Settlement, the Notice of Objection to Settlement Form and Request for Inspection Form;
  - (f) these orders; and
  - (g) the Microsoft Teams link and accompanying details to enable those Group Members who wish to observe or to be heard at the Settlement Approval Application hearing, once it has been listed and made available by the Court,
- to be displayed on, or otherwise made available for download from, their website at the address <https://www.aderolaw.com.au/class-action/wilson-security/> and to remain continuously displayed or available up to and including the final determination of the Approval Application.
7. By 4.00 pm AWST on 29 October 2025, the Respondent is to produce the last known contact information of the Group Members held by the Respondent, being the mobile phone, email and postal address and the emergency contact information of the Group Members on file to Adero Law, to the extent the Respondent has that information within its payroll or human resources systems (the **Group Member Data**).
8. By 4.00 pm AWST on 30 October 2025, Adero Law will cause the Notice of Settlement and Group Member Cover Letter in the form at **Annexure B** to these orders to be sent to each Group Member in accordance with the procedures and requirements set out in the following paragraphs (**Distribution Protocol**):
- (a) Adero Law will send the Notice of Settlement to the persons listed in the Group Member Data produced by the Respondent, doing so under cover of the Group Member Cover Letter at **Annexure B** to these orders, by email to each person on the list for whom an email address is held, and by registered post to



the last recorded postal address of that person in the event that the Respondent does not have an email address for that person;

- (b) if Adero Law receives an electronic notice that an email to any person has not been delivered to the addressee, Adero Law shall within 72 hours send the Notice of Settlement under cover of the Group Member Cover Letter by registered post to the last recorded postal address of that person;
  - (c) Adero Law shall within seven (7) business days after completion of the preceding steps provide to the Respondent's solicitors a list of the persons to whom the Notice of Settlement was sent, together with the email or postal address to which the notice was sent, and which identifies in relation to each Group Member:
    - (i) the method(s) by which the Notice of Settlement was sent;
    - (ii) the date(s) on which the Notice of Settlement was sent;
    - (iii) whether and which distribution attempts failed; and
    - (iv) the form of the evidence by which any failed distribution attempt was identified, including, but not limited to, by way of receipt of an email delivery failure notification, or receipt of a registered post envelope marked 'return to sender' (or similar).
  - (d) Adero Law is to retain records for the duration of this proceeding of all communications sent to and received from each Group Member listed in the Group Member Data produced by the Respondent in the course of carrying out this Distribution Protocol, including:
    - (i) the emails sent in accordance with subparagraph (b) above;
    - (ii) postal records or receipts or similar of the Notice of Settlement sent by registered post in accordance with subparagraph (c) above; and
    - (iii) evidence of any failed distribution attempts of the kind referred to in subparagraph (c)(iv) above.
9. Should either party become aware of any actual or potential non-compliance with the Distribution Protocol, they are to notify the other party within two (2) business days



of becoming so aware; and are directed to promptly advise the Court of any such non-compliance via email to the associate to the case managing judge.

### *Objections to the Settlement*

10. By 11.59 pm AWST on 5 December 2025 (**Objection Deadline**), any Group Member who wishes to oppose the Settlement shall file and serve a completed Notice of Objection to Settlement Form in the form of Schedule 1 to the Notice of Settlement by sending it to the Court and/or Adero Law:
  - (a) by email or by post to the Western Australia Registry of the Federal Court at [perth.registry@fedcourt.gov.au](mailto:perth.registry@fedcourt.gov.au) or Federal Court of Australia (WA Registry), GPO Box A30, Perth WA 6001; and/or
  - (b) by email or by post to Adero Law at [wilsonsecurity@aderolaw.com.au](mailto:wilsonsecurity@aderolaw.com.au) or Adero Law, 3 Hobart Place, Canberra ACT 2601.
11. If on or before the Objection Deadline the solicitors for any party receive a notice purporting to be a Notice of Objection to Settlement Form which has not also been sent to the Western Australia Registry of the Federal Court, the solicitors must file the forms by email or by post to the Western Australia Registry of the Federal Court at [perth.registry@fedcourt.gov.au](mailto:perth.registry@fedcourt.gov.au) or Federal Court of Australia (WA Registry), GPO Box A30, Perth WA 6001 within two business days after receipt, with a notation as to the date of receipt. Any such form shall be treated as a Notice of Objection to Settlement Form received by the Court at the time it was received by the solicitors.
12. The solicitors for the Applicant and the Respondent each be granted leave to inspect the Court file and uplift for the purpose of copying any Notice of Objection to Settlement Forms.

### **Directions for Approval Application**

#### *Settlement Approval Application Hearing*

13. The Settlement Approval Application be set down for hearing on 17 December 2025 at 10.15 am AWST, on an estimate of half a day.



### *Settlement Approval Application*

14. By 4.00 pm AWST on 7 November 2025, the Applicant shall file and serve the Approval Application, seeking the following orders:
  - (a) the Approval Order;
  - (b) the Dismissal Order;
  - (c) any Distribution Order;
  - (d) the SDS Order;
  - (e) the SDS Costs Order; and
  - (f) an order that Rory Markham of Adero Law (or any other specified person who consents to be bound by the terms of the Deed of Settlement which impose obligations on the Settlement Administrator) be appointed as Administrator of the Settlement Distribution Scheme.
15. By 4.00 pm AWST on 10 December 2025, the Applicant shall file and serve any affidavit(s) and written outline of submissions in relation to the Approval Application.
16. By 4.00 pm AWST on 15 December 2025, the Respondent shall file and serve any affidavits and written outline of submissions in relation to the Approval Application.

### **Interim Regime for Confidentiality**

17. Leave is granted to the parties to file any affidavit, annexure, exhibit or submissions in respect of which confidentiality orders are to be sought on the Approval Application (**Confidential Documents**) by email to the associate to the case managing judge marked in the subject line with the word '*Confidential [Affidavit or Submissions] for Purposes of Settlement Approval Application – Not to be Accessed Except by Direction of a Judge or the Court*' and the parties be excused from any requirement to electronically file or serve any Confidential Documents in that form. To the extent that any Confidential Documents are not entirely confidential, the party shall file electronically and serve a redacted copy of the documents redacting only those parts which are claimed to be confidential.
18. The parties shall provide the chambers of the case managing judge with versions of the Confidential Documents highlighting (but not redacting) the parts of the



documents over which the confidentiality orders are sought, differentiating between those parts where confidentiality is sought without time limit (such as any confidential opinion of counsel) and those parts where confidentiality is sought only until orders approving the proposed settlement are made and the expiry of the appeal period from those orders.

19. Pursuant to s 37AI of the Act, any Confidential Documents filed by way of email with the associate to the case managing judge in accordance with order 17 of these orders is suppressed until 5.00 pm AWST on 17 December 2025.
20. Any application for ongoing confidentiality orders in respect of any document filed in accordance with order 17 above will be determined as part of the determination of the Approval Application.

#### **Costs**

21. All of the Applicant's costs arising from these orders will be dealt with by the Court as part of the Applicant's costs of the proceeding.

#### *Liberty to apply*

22. The parties have liberty to apply.

Date orders authenticated: 27 October 2025

  
Registrar

Note: Entry of orders is dealt with in Rule 39.32 of the *Federal Court Rules 2011*.



## ANNEXURE A

### NOTICE OF PROPOSED SETTLEMENT

**PITA AWATERE TE TAU O TE RANGI v WILSON SECURITY PTY LTD (ACN 127 406 295) (WAD229/2022) ('Class Action')**

You should read this Notice carefully as it concerns your legal rights. You have been sent this Notice by order of the Federal Court of Australia because you may be a Group Member in the above proceedings. It contains important information about the proposed settlement of these proceedings and your rights to object to the settlement. This notice is not legal advice. You should seek independent legal advice if you are unsure what to do, noting the time limit to object to the proposed settlement expires on 5 December 2025.

### SECTION 1 – INFORMATION ABOUT THE PROPOSED SETTLEMENT

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#### What is this Class Action?

1. This Class Action was commenced on 27 October 2022 against Wilson Security (**Wilson**). Mr Pita Awatere Te Tau O Te Rangi (the **Applicant**) provided instructions to the solicitors, Adero Law on his own behalf and on behalf of all persons who are Group Members throughout the course of the proceeding.
2. The Class Action arose out of the proceeding initially commenced by Mr Peter Wilkinson (WAD138/2021) (**Wilkinson Proceedings**) and is in respect of alleged wage underpayments by Wilson at **Sites** operated by Woodside Petroleum (being the Karratha Gas Plant, Pluto LNG Park, King Bay Supply Base and Burrup Material Facility) under the *Security Services Industry Award 2010* (which became the *Security Services Industry Award 2020* when it commenced on 18 June 2020) (the **Awards**).

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#### Are you a Group Member?

3. You are a Group Member if:
  - (a) you did not opt out of this proceeding by 11.59 pm AWST on 29 January 2024;
  - (b) you were at any time, in the period between 31 March 2015 to 27 October 2022, employed by Wilson and:





- (1) worked in a position:
    - (A) that was covered under the Awards;
    - (B) as a "full time employee" or "part time employee" as those terms are defined in the Awards;
    - (C) at the Sites;
    - (D) was a group member in the Wilkinson Proceedings; and
  - (2) to whom the Award applied in relation to your employment.
4. Group membership also extends to include the deceased estates of the persons described in 3 above.
  5. If you are unsure if you are a Group Member, you should contact Adero Law, the solicitors for the Applicant, on (02) 6189 1022 or at [wilsonsecurity@aderolaw.com.au](mailto:wilsonsecurity@aderolaw.com.au) or seek your own legal advice without delay.

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**What does the Settlement involve?**

6. The parties participated in a mediation on 15 September 2025.
7. The parties to the Class Action have agreed to a proposed settlement of the Class Action (**Settlement**), which means that the parties agreed to resolve the Class Action out of Court without going to trial.
8. The Settlement requires the approval of the Court. At **10.15 am AWST on 17 December 2025**, there will be a Court hearing where the Court will determine whether it approves the settlement.
9. The terms of the Settlement include the payment by Wilson of a fixed lump sum figure of **\$3,050,000** in full and final settlement of the claims of the Applicant and all Group Members and inclusive of all costs, including legal and administration costs, expenses, disbursements, interest, and penalties (**Settlement Sum**).
10. The Settlement Sum is to be paid by Wilson without any admission of liability or wrongdoing and on a commercial basis to resolve the proceedings without the parties incurring further legal fees, noting that the Class Action has already been on foot since October 2022.



11. **If the Settlement is approved by the Court, the Class Action will be dismissed, and Group Members may receive a payment from the Settlement Sum.**
12. If the Court approves the Settlement, the Applicant and all Group Members (except for those who have opted out) will release Wilson and its related entities from:
  - all claims that are made and could have been made against Wilson by the Applicant and Group Members in the Class Action; and
  - to the extent permitted by law, all claims that are made and could have been made by the Applicant and Group Members that are in respect of, or arise out of, directly or indirectly, the same, similar or related circumstances to the claims made in the Class Action,

including any claim for compensation, damages, interest, other losses, pecuniary penalties, or costs.

**As a Group Member, you will be bound by the Settlement if it is approved by the Court regardless of whether you receive any money from the Settlement.**

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**How Much Will Group Members Receive Under the Settlement?**

13. The dollar amount you receive if you are found to be eligible will be worked out following a process set out in the Settlement Distribution Scheme. The Settlement Distribution Scheme outlines the process by which the Settlement Sum is proposed to be paid to Group Members on a fair and reasonable basis and must also be approved by the Court.
14. The Settlement Distribution Scheme will propose that after making deductions (see paragraph 19 below) the balance of the Settlement Sum will be distributed on the terms set out in a Settlement Distribution Scheme between Group Members, being approximately 186 individuals.
15. The precise amount that will be payable to each individual Group Member is not yet known and cannot yet be accurately estimated, including because it depends on the Court approving the method by which the settlement sum is to be distributed and the total amount of the deductions from the Settlement Sum which are to be approved by the Court.
16. It is currently proposed that Group Members' claims will be calculated using a claims calculation model that has regard to, at least, information about Group Members



produced by Wilson, such as their employment type, length of time Group Members were employed and the actual hours they worked each day (**Calculation Model**). As mentioned above, the Settlement Distribution Scheme, including the Calculation Model must be approved by the Court.

17. Please note that Group Members will **not** receive the full value of their alleged claim under the Settlement and some Group Members may not receive any monies from the Settlement Sum if the Administrator of the Settlement Distribution Scheme determines that there is no evidence to support their individual claims. The Settlement is a compromise of the claims made taking into account, amongst other matters, the time and cost of continuing to pursue the matter and the risk the Applicant may not be successful if the claims were to proceed to trial.

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**Are Group Members liable for legal or other costs?**

18. If the Court approves the Settlement, the Settlement Sum will be in full and final satisfaction of all costs. The costs incurred by the Applicant in pursuing the Class Action, in an amount approved by the Court, will be paid from the Settlement Sum prior to the distribution of any Settlement Payments to Group Members. This ensures that all Group Members who benefit will contribute to the legal or other costs and are treated equally.
19. The amounts which are proposed to be deducted from the Settlement Sum (each of which is subject to Court approval) before it is distributed to eligible Group Members are for:
  - (a) **Adero Law's Legal Costs** representing the Applicant's reasonable legal costs and disbursements on a solicitor and own client basis (calculated in accordance with the Applicant's retainer with Adero Law) incurred on his own behalf and on behalf of all or any Group Members in the Proceeding and approved by the Court. This includes work already done, and work which will be done up to and including the Settlement Approval Application hearing, which total an estimated amount of **\$1,143,750** (including a 25% uplift fee chargeable on a portion of fees).
  - (b) **Administration Costs** of administering the Settlement Distribution Scheme, in an estimated amount of **\$87,530**. It is proposed that Adero Law be appointed as Administrator of the Settlement Distribution Scheme under Court supervision.



20. The Court will need to approve deduction of any of these costs in advance and may approve lesser amounts than what is proposed. These costs may also be subject to a costs assessment by an independent costs expert. If you have a concern about the costs proposed to be deducted, you are free to file a "Notice of Objection" (see paragraphs 31 to 32 below). The Settlement (including the Settlement Sum) may be approved by the Court even if the Court does not approve any or some of the proposed deductions above.
21. You will not otherwise be required to pay any costs for the Class Action, regardless of whether you receive a Settlement Payment.

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**What is the settlement approval process?**

22. The Court still needs to approve the Settlement. The Settlement does not come into effect unless it is approved by the Court.
23. The Settlement Approval Application must be made by the Applicant. This will involve orders being made by the Court for the following steps:
  - (a) orders for any person to file evidence and submissions in respect of the Settlement Approval Application;
  - (b) Court approval of this notice to be distributed to Group Members regarding the Settlement;
  - (c) a hearing date, being 10.15 am AWST on 17 December 2025, for the Court's consideration and approval of:
    - (1) the Settlement;
    - (2) the proposed Settlement Distribution Scheme and its costs; and
    - (3) arrangements for the reimbursement of any costs incurred by the Applicant but not recovered from the Respondent;
  - (d) following the completion of a Settlement Distribution Scheme – disposing of the proceeding (ie by dismissing the proceeding).
24. When applying to the Court for approval of the Settlement, the Applicant will be required to persuade the Court that:



- (a) the Settlement is fair and reasonable having regard to the claims made on behalf of the Group Members who will be bound by the settlement; and
  - (b) the Settlement has been undertaken in the interests of Group Members, as well as those of the Applicant, and not just in the interests of the Applicant and the Respondent.
25. You may file a Notice of Objection to the Settlement and/or any aspect of the proposed distribution of the Settlement Sum to eligible Group Members. If you wish to file a Notice of Objection to the Settlement, you must do so by no later than **11.59 pm AWST on 5 December 2025**. The Court will take any objections into account in deciding whether or not to approve the Settlement.

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**How can I access the Deed and the Settlement Distribution Scheme?**

26. Upon signing a Request for Inspection Form at Schedule 2 of this Notice of Settlement, Group Members may obtain a copy of the Deed of Settlement and the Settlement Distribution Scheme, which are to be kept strictly confidential.
27. If you wish to obtain a copy of these documents, you must complete and return the Request for Inspection Form at Schedule 2 of this Notice of Settlement by no later than 5 December 2025.

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**Where can I get more information?**

28. If you have any questions or queries, you may contact Adero Law, at [wilsonsecurity@aderolaw.com.au](mailto:wilsonsecurity@aderolaw.com.au) with the subject line: Settlement WAD229/2022.

If you are unsure of what to do, you should seek independent legal advice.

**SECTION 2 – INFORMATION ABOUT YOUR OPTIONS**

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**Your options if you are a Group Member**

29. If you have not opted out of the Class Action, and you meet the Group Member definition (at paragraph 3), you are a Group Member and you have two options.

**Option A: Do nothing (and participate in the Settlement)**

30. You do not need to do anything in response to this notice and you will remain a Group Member and participate in the Settlement. **If the Settlement is approved by**





the Court, you may be eligible to receive a payment. You will be bound by the settlement and may need to provide certain information to the administrator in order for the administrator to calculate your share of the settlement.

**Option B: Object by 11.59 pm AWST on 5 December 2025**

31. You may object to the Settlement by completing the Notice of Objection to Settlement Form attached as Schedule 1 to this Notice and submitting it to the Court and representatives of the parties at the emails or postal addresses on the form **by no later than 11.59 pm AWST on 5 December 2025**. If you choose to do this, you will still remain a Group Member and will still participate in the Settlement if it is approved.
32. Any objections received by the Court will be considered by the Court, along with any evidence and submissions filed by the Applicant and Wilson, in determining whether or not the Settlement should be approved. The Court may permit you to make an application to opt out of the Class Action, which, if allowed, will mean you will not be bound by the Settlement, you will not receive any Settlement Payments, and you will need to pursue an individual claim by yourself.
33. If after considering any objections, the Court does not approve the Settlement and you have not opted out, then the Class Action will continue. At or following a trial of the common issues, the Court may give directions in relation to the determination of any remaining issues, including directions relating to your individual claim.



**SCHEDULE 1 – OBJECTION TO SETTLEMENT**

**PITA AWATERE TE TAU O TE RANGI v WILSON SECURITY PTY LTD (WAD229/2022)**

**Please return this form to:**

**By post:** Federal Court of Australia (WA Registry), GPO Box A30, Perth WA 6001  
and  
Adero Law, 3 Hobart Place, CANBERRA ACT 2601

**OR**

**By email:** perth.registry@fedcourt.gov.au with subject line: Notice of Objection  
WAD229/2022  
and  
wilsonsecurity@aderolaw.com.au with subject line: Notice of Objection  
WAD229/2022

The person named below gives notice that the person **OBJECTS** to the Settlement of this proceeding.

**Details of Objector**

Name of Individual	
Period of employment	
Telephone	
Email Address	
Postal Address	



**Ground(s) of Objection**

I am a Group Member in the above proceedings and I object to the Settlement of because  
[set out below any reasons for objecting and any submissions supporting those reasons,  
attaching additional pages if necessary]:

Signed	
Name of Person Signing	
Date	





**SCHEDULE 2 – REQUEST FOR INSPECTION FORM – SETTLEMENT DEED AND  
SETTLEMENT DISTRIBUTIONS SCHEME**  
**PITA AWATERE TE TAU O TE RANGI v WILSON SECURITY PTY LTD (WAD229/2022)**

Name of Individual	
Email Address	

**Please sign below and send the completed Request for Inspection Form to:**

**By post:** Adero Law, 3 Hobart Place, CANBERRA ACT 2601

**OR**

**By email:** wilsonsecurity@aderolaw.com.au with subject: Inspection Request  
WAD229/2022

I, \_\_\_\_\_ [*print full name*] undertake to keep confidential, and not publish, disclose, or discuss the contents of the Settlement Deed and/or Settlement Distribution Scheme made available to me by Adero Law in connection with the proposed settlement of the Class Action, to any person or entity other than:

- a) any solicitor of Adero Law acting in the Class Action; or
- b) an Australian Legal Practitioner, for the purposes of seeking and receiving independent legal advice; or
- c) an accountant or financial adviser, for the purposes of seeking taxation advice; or
- d) any person who also has been provided with a copy of those documents in accordance with orders made by the Federal Court of Australia.

I will not use the documents provided to me by Adero Law for any other purpose other than for considering my rights in the Class Action.

I understand that this undertaking shall not apply in circumstances where I disclose the contents of the documents provided to me:

- a) after I have received written consent of Adero Law; or
- b) as required by law, or as ordered by the Court.

Signed \_\_\_\_\_ Witness \_\_\_\_\_



Date \_\_\_\_\_

Witness Name \_\_\_\_\_

Witness Date \_\_\_\_\_



**ANNEXURE B  
GROUP MEMBER COVER LETTER**

Dear Group Member

**CLASS ACTION – PITA AWATERE TE TAU O TE RANGI v WILSON SECURITY PTY LTD  
(ABN 90 127 406 295) (WAD229/2022)**

You are receiving this correspondence because, based on the information available, you may have been employed by Wilson Security Pty Ltd (**Wilson**) at Woodside sites at any stage between 31 March 2015 to 27 October 2022 and may be a Group Member in the Class Action.

The notice enclosed with this correspondence has been approved by the Federal Court of Australia. It provides you with important information about:

1. the settlement of the class action; and
2. your right to object to the settlement of the class action and/or any aspect of the proposed distribution of the settlement proceeds before the deadline of **11.59 pm AWST on 5 December 2025**.

It is therefore very important that you read the enclosed Notice carefully.

If you have any questions, please visit the Class Action website at <https://www.aderolaw.com.au/class-action/wilson-security/> or contact Adero Law directly at [wilsonsecurity@aderolaw.com.au](mailto:wilsonsecurity@aderolaw.com.au).

Alternatively, you may wish to seek independent legal advice regarding the matters set out in this Notice.